

DEPOSITION OF: ALISHA SINGLETON

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 13		O
Page 14		O
Page 15:4-13, 25		O
	Page 15:14-15	S (No Answer)
Page 16		O
Page 23:23-25		O
Page 24		O
Page 25		O
Page 27		O
Page 28		O
Page 29		O
	Page 29:17-20	O
Page 30		O
Page 31		O
Page 32		O
Page 33		O
Page 34		O
Page 35		O
Page 36		O
Page 37		O
Page 38		O
Page 39		O
Page 42		O
Page 43		O
Page 44		O
Page 45		O
Page 46		O
Page 47		O
Page 48		O
Page 50		O
Page 51		O
Page 52		O
Page 54		O
Page 56		O
Page 59		O
Page 60		O
Page 61		O
Page 62		O
Page 63		O
Page 64		O

Singleton P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 65		O
Page 66		O
Page 67		O
Page 69		O
Page 70		O
	Page 70:6-8	O
Page 71		O
Page 72		O
Page 73		O
Page 74		O
Page 75		O
Page 77		O
Page 78		O
Page 79		O
Page 80		O
Page 81		O
Page 82		O
Page 83		O
Page 84		O
Page 85		O
	Page 85:10-15	<i>S- No Q</i>
Page 86		O
Page 87		O
Page 88		O
Page 89		O
Page 90		O
Page 91		O
Page 92		O
	Page 92:18-25	O
Page 93		O
Page 94		O
Page 95		O
Page 96		O
Page 97		O
Page 98		O
Page 100		O
Page 101		O
Page 102		O
Page 104		O
	Page 104:5-8	<i>except S- No Q</i>
Page 105		O
Page 109		O

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GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 110		0
Page 111		0
Page 112		0
Page 117		0
Page 119		0
Page 120		0
Page 121		0
Page 122		0
Page 123		0
Page 124		0
Page 125		0
Page 127		0
Page 128		0
Page 129		0
Page 130		0
Page 131		0
Page 132		0
Page 133		0
Page 134		0
Page 135		0
Page 136		0
Page 137		0
Page 138		0
Page 139		0
Page 140		0
Page 141		0
Page 142		0
Page 143	1	0
Page 144		0
Page 145		0
Page 151		0
Page 154		0
Page 158		0
Page 161		0
Page 162		0
Page 163		0
Page 166		0
Page 167		0
Page 168		0
Page 170		0
Page 171		0
Page 172		0

Singleton P.4

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 173		0
Page 174		0
Page 175		0
Page 176		0
Page 177		0
Page 180		0
Page 181		0
Page 182		0
Page 183		0
Page 186		0
	Page 195:20-25	0
Page 196		0
Page 197		0
Page 198		0
Page 199		0
	Page 200:16-21	0 except 5 & 21
Page 201		0
	Page 201:9-13	0
Page 202		0
Page 203		0
Page 204		0
	Page 206:22-25	0
	Page 207:1-8	0
Page 209		0
Page 211		0
Page 212		0
Page 217		0
Page 218		0
Page 219		0
Page 220		0
Page 221		0
		0
Page 223		0
Page 224		0
Page 225		0
Page 226		0
Page 227		0
Page 228		0
Page 229		0
Page 230		0
Page 231		0
Page 233		0

Singleton P.5

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 235		0
Page 241		0
Page 242		0
Page 243		0
Page 244		0
Page 245		0
Page 246		0
Page 259		0

DEPOSITION OF: BRUCE SCOTT

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 22		O
Page 23:1-5		O
Page 23:20-25		O
Page 24:1-3		O
Page 24:19-25		O
Page 25:1-5		O
Page 25:19-25		O
Page 26		O
Page 27		O
Page 28:2-12		O
Page 28:15-19		O
Page 30		O
Page 31:1-11		O
Page 31:23-25		O
Page 32		O
Page 34		O
Page 35		O
Page 36:2-13		O
Page 36:22-25		O
Page 37:1-16		O
Page 37:17-25		O
Page 38		O
Page 39:1-4		O
Page 39:18-25		O
Page 40:1-18		O
Page 40:19-24		O
Page 41		O
Page 47		O
Page 48		O
Page 49:2-16		O
Page 49:20-25		O
Page 50		O
Page 52:16-24		O
Page 53		O
Page 54		O
Page 55		O
Page 56		O
Page 57		O
Page 58		O
Page 59:1-3		O

Scott P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 59:11-23		0
Page 60		0
	Page 61:4-9	5 (No Q)
	Pages 64:22-65:2	0
		0
Page 65		0
Page 66		0
Page 67		0
Page 68		0
Page 69		0
Page 70:1-10		0
	Page 70:11-13	0
Page 71		0
Page 72		0
Page 73		0
Page 74		0
Page 78		0
Page 80		0
Page 81		0
	Page 82:2-7	0
	Page 82:15-25	0
	Page 83:15-23	0
	Page 84:3-11	0
Page 84		0
Page 85		0
	Page 86:6-11	5
Page 87		0
Page 93		0
Page 94		0
Page 95		0
Page 96:1-17		0
Page 96:18-22		0
Page 97		0
Page 98		0
Page 99		0
Page 100:1-6		0
Page 100:18-25		0
Page 101		0
	Pages 104:23-25, 105:1	5 (No Q)
Page 105:4-15		0
Page 106		0
Page 107:1-13		0

Scott R3

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 107:19-25		0
Page 108		0
Page 109		0
Page 110		0
Page 111		0
Page 112		0
Page 113		0
Page 114		0
Page 117		0
Page 118		0
Page 120		0
Page 121		0
Page 123		0
Page 127		0
Page 128		0
Page 130		0
	Page 130:18-19	0
Page 136		0
	Pages 137:20-138:11	0
Page 140		0
Page 141		0
Page 143		0
Page 146		0
Page 147:7-13		0
	Page 147:14-23	0
Page 148		0
Page 149:1-7		0 1-4; 5-7
Page 149:16-25		0
	Pages 151:22-152:5	0
Page 152:6-9		0
Page 153		0
Page 154		0
Page 156		0
Page 157		0
Page 158		0
Page 159		0
Page 164:9-13		0
Page 164:24-25		0
Page 165:9-12		0
Page 165:18-22		0
Page 166		0
Page 167		0

Scott R. 4

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 168		O
	Pages 168:25-169:13	O
Page 170		O
	Pages 171:25-172:4	5 - No Q
Page 172		O
	Page 173:3-14	O
	Page 173:22-174:9	O
Page 174		O
Page 175		O
Page 176		O

DEPOSITION OF: JAMES CHARLES HILL

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 19		0
Pages 22-23		0
Page 26		0
Pages 40-41		0
Page 42		0
Pages 46		0
Pages 50-51		0
Pages 54		0
Pages 58		0
Pages 62		0
Page 66		0
Page 70		0
Page 74		0
Page 78		0
Pages 82		0
Page 86		0
Pages 90-91		0
Page 94		0
Pages 98		0
Page 102		0
Page 106		0
Page 110		0
Page 114		0
Page 118		0
Page 122		0
Page 126		0
Page 130		0
Page 138		0
Page 145		0
Page 148		0
Page 150		0
Pages 152		0
Page 155		0
Page 158		0
Page 162		0
Page 166		0
Page 170		0
Page 178		0
Page 184		0
Page 186		0
Page 190		0
Page 198		0
Page 202		0
Page 208		0
Pages 219		0

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Pages 222-223		0
Pages 227-228		0
Pages 231-232		0
Page 237		0
Page 238		0
Page 244		0
Page 246		0
Page 252		0

DEPOSITION OF: IOLANI MENZA

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 21		O
Page 23		O
Page 25		O
Page 28		O
Page 29		O
Page 30		O
Page 31		O
Page 32		O
Page 33		O
Page 34		O
Page 35		O
Page 36		O
Page 38		O
Page 39		O
Page 40		O
Page 42		O
Page 43		O
Page 44		O
Page 45		O
Page 46		O
	Page 46:1-2	O
Page 47		O
Page 48		O
Page 49		O
Page 50		O
Page 51		O
Page 52		O
Page 53		O
Page 54		O
Page 55		O
Page 56		O
Page 57		O
Page 58		O
Page 59		O
Page 60		O
	Pages 62:6-63:3	O
Page 63		O
	Page 65:2-7	5- No Q; No answer
Page 67		O

Menya P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 68		0
Page 69		0
	Page 69	0
Page 71		0
Page 72		0
Page 73		0
Page 74		0
	Page 74:16-33	0
Page 76		0
Page 77		0
	Page 77:17-19	0
	Page 78:9-14	52 9+10; 0 11-14
Page 78		11
	Page 80:5-8	0
Page 80		0
Page 81		0
	Page 84:1-8	0
Page 84		0
Page 85		0
Page 86		0
Page 87		0
Page 88		0
Page 89		0
Page 90		0
Page 92		0
Page 93		0
Page 94		0
Page 99		0
Page 101		0
Page 109		0
Page 110		0
Page 111		0
Page 112		0
Page 113		0
Page 115		0
Page 116		0
Page 117		0
Page 118		0
Page 119		0
Page 120		0
Page 121		0
Page 122		0

Menga P. 3

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 123		0
Page 125		0
Page 126		0
Page 127		0
Page 128		0
Page 129		0
Page 130		0
Page 131		<i>except 219 is stricken</i>
Page 132		0
Page 133		0
Page 134		0
Page 135		0
Page 136		0
Page 137		0
Page 138		0
Page 139		0
Page 140		0

DEPOSITION OF: WILLIAM MCHATTON

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 12:1-13		0
Pages 16:7-14; 22-25 and 17:1		0
Page 20:1-12		0
Page 21:13-17		0
Page 22:3-11		0
Page 23:18-21		0
Page 25:5-19		0
Page 26:12-25		0
Page 27:1-23		0
	Pages 27:24-28:14	0
Page 30:4-12		0
Page 31:5-17		0
Page 32:21-25		0
Page 33:1-9, 15-22		0
Page 34:11-22		0
Page 35:1-4, 7-12		0
Page 36:1-7		0
Page 37:4-10, 14-18		0
Page 41:12-25		0
Page 42:1-9		0
Page 43:9-24		0
Page 44: 6		0
Page 44: 19-25		0
Page 45		0
Page 46		0
Page 47: 21-25		0
Page 48		0
	Pages 49:6 – 50:25	0
Page 51:13-20		0
Page 52		0
Page 53		0
Page 54		0
Page 55		0
Page 56		0
Pages 57:24-25, 58:1-3		0
Page 59:7-10		0
Pages 60, 61:1-3		0
Page 62:12-25		0
Page 63		0

M. Hatton P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 64:18-22		0
Page 66:8-23		0
Page 68		0
Page 69		0
Page 70		0
Page 71		0
Page 72:7-8		0
Page 73		0
Page 74		0
Page 75		0
Page 76:1-9		0
Page 77		0
Page 78		0
Page 79		0
Page 80		0
Page 81		0
	Page 82:5-13	5
Page 83		0
	Page 84:6-15	5 (NO Q)
Page 84		0 except 26-15
	Page 86:5-6	5 (NO Q)
Page 86		5 27-11, 0 to balance
Page 87		0
Page 88		0
Page 96		0
Page 97		0
Page 98		0
Page 103		0
Page 104		0
Page 106		0
Page 108		0
Page 111		0
Page 112		0
Page 113		0
Page 114		0
Page 115		0
Page 117		0
Page 118		0
Page 119		0 except 21-24
	Page 119:21-24	5
Page 120		0
Page 121		0

McHatten P. 3

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 122		0
Page 123		0
Page 124		0
Page 125		0
Page 126		0
Page 127		0
Page 131		0
Page 132		0
Page 133		0
Page 139		0
Page 141		0
Page 142		0
Page 143:20-25		0
Page 144		0
Page 145		0
Page 146		0
Page 149		0
Page 150		0
Page 151		0
Page 152		0
Page 153		0
Page 154		0
Page 155		0
Page 156		0
Page 157		0
Page 158		0
Page 163		0
Page 164		0
Page 165		0
Page 168		0
Page 171		0
Page 172		0
Page 173		0
Page 174		0

DEPOSITION OF RYAN KIMBLE

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
	Pages 10:25-11:15	O
Pages 17, 20		O
	Pages 19:2-6 and 21:6-9	O O
Pages 22-25		O
	Page 25:6-10	O
	Pages 27:4-14	O
	Pages 29:17-23	O
Page 30		O
	Page 33:7-9	O
	Page 34:3-9	O
Pages 38-41		O
Pages 42-45		O
	Page 43:5-44:8	O
Pages 46-49		O
Page 52		O
	Page 52:7-10	O
Page 66		O
	Pages 66:11-16 and 66:25-67:1	O
	Pages 70:9-15 and 71:2-10	O
Page 73		O
Page 74		O
Pages 78-81		O
Pages 90-91		O
Pages 106-109		O
Pages 110-113		O
	Page 111:8-15	O
	Pages 118:1-119:19	O
Page 120		O
Pages 122-125		O
Pages 126-129		O
	Page 127:3-9	O
	Page 130:13-22	O
	Page 137:2-19	O
Page 138		O

**DEPOSITION OF RYAN KIMBLE AS RULE 30(b)(6) DESIGNEE OF THE
GEO GROUP, INC.**

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
	Pages 20:19-21:2	0
	Page 22:5-13	5
Page 24:5-8, 17-25		0 0
Page 27		0
	Page 28:19-24	0
Page 30		0
Page 31		0
	Page 31:15-18	0
	Page 32:17-24	0
	Page 33:20-23	0
	Page 34:4-8	0
Page 34:15-25		0
Page 35		24-6:0; 1/6-20:5
Page 36		0
	Page 36:11-19, 23-25	0 0
	Page 37:1-9	0
Page 38		0
Page 39		0
Page 40		0
	Page 40:6-8	5
Page 41		0
Page 42		0
	Page 42:6-13	0
Page 43		0
Page 44		0
Page 45		0
Page 46		0
Page 47		0
Page 48		0
Page 49		0
Page 50		0
Page 51		0
Page 53		0
Page 54		0
Page 55		0
Page 56		0
	Page 56:3-6	0
Page 57		0

Kimble (3d/3(a)) p. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 58		0
Page 59		0
Page 60		0
	Page 61:6-13	0
Page 61		0
Page 62		
	Page 62:7-11, 16-19	S S (No Q's)
Page 76		0
Page 79		0
Page 80		0
Page 82		0
Page 83		0
Page 84		0
Page 85		0
Page 86		0
Page 87		0
Page 88		0
Page 89		0
Page 90		0
Page 91		0
Page 92		0
Page 93		0
Page 94		0
Page 95		0
Page 96		0
Page 97		0
Page 98		0
	Page 99:6-20, 16-19	S S (No Q's)
	Page 100:6-23	S (No Q)
Page 103		0
Page 104		0
Page 105		0
Page 106		0
Page 107		0
Page 108		0
Page 109		0
Page 111		0
Page 112		0
	Page 112:4-5	0
Page 113		0
Page 114		0
Page 115		0

Kimble (30(B)(6)) P.3.

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 116		0
Page 117		0
Page 118		0
	Page 122:22-123:1	5 (No Q)
Page 125		0
Page 126		0
Page 128		0
Page 150		0
Page 151		0
Page 152		0
Page 153		0
	Page 153:18-154:6 and 154:10-13	5 (No Q) 5 (No Q)
Page 154		0 except 210-13
Page 155		0
Page 156		0
Page 157		0
Page 158		0
Page 159		0
Page 164		0
Page 165		0
Page 166		0
Page 167		0
Page 168		0
Page 169		0
Page 170		0
Page 171		0
Page 173		0
Page 174		0
Page 175		0
Page 176		0
Page 179		0
Page 180		0
Page 181		0
Page 182		0
Page 190		0
Page 191		0

DEPOSITION OF: BERTHA HENDERSON

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 17		0
Page 24: 1-8 + 26: 1-13		0 0
Page 27: 15-25		0
Page 28: 1-13		0
Page 29: 1-25		0
Page 30: 1-21		0
Pages 31:5-25; 32-1-2		0
Pages: 35:3-25, 36:1-25, 37: 1-25		0
Pages 38-41		0
Page 42: 1-25		0
Page 46: 11-21		0
	Page 52: 13-16; 52:24-53:1	0 0
Page 53: 19-25		0
Pages 54: 1-3; 57: 1-19		0 0
Pages 59-61		0
Pages 62-64		0
Pages 68:1-9; 69: 5-12		0 0
Pages 70-73		0
Pages 74-77		0
Pages 78-81		0
Pages 94: 6-25; 95; 96; 97: 7-25		0 0 0 0
Pages 98; 101		0
Pages 102-104		0
Pages 108-109		0
Pages 110; 112-113		0
Pages 114-117		0
Pages 118, 119, 121		0
Pages 122-125		0
Pages 126-129		0
Pages 130-133		0
Pages 134-137		0
Pages 138-141		0
Pages 142-145		0
Pages 146-147		0
Pages 154-157		0
Pages 158-161		0
Pages 162-164		0
Pages 166-169		0

Henderson P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Pages 170-173		0
Page 174		0
Page 179		0
Page 182		0
Pages 186, 187, 189		0
Pages 190-193		0
Pages 194-197		0
Page 198		0
Pages 202-205		0
Pages 206-209		0
Pages 210, 213		0
Pages 223-225		0
Page 226		0
Page 230		0

DEPOSITION OF: LEONARDO JARAMILLO

GEO Objection to State
Designation and State
Response

State Response/Objection to
GEO Counter-Designation

Ruling

	Page 25	5
	Page 26	23-0 13-5 after "No"
	Page 35 / Lines 16-18	0
	Page 37-38	0
	Page 69	5
	Page 72-73	5

The Honorable Robert J. Bryan

~~COPY FOR YOUR
INFORMATION~~

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 17-cv-05769-RJB

TABLE IDENTIFYING
PLAINTIFFS' DEPOSITION
DESIGNATIONS AND
DEFENDANT'S OBJECTIONS

+ Court's Rulings

In accordance with this Court's letter dated May 8, 2020 (Dkt. No. 305), Plaintiffs respectfully identify for the Court the following deposition designations and Defendant's objections thereto:

ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
6:2-3			✓
6:15-18			✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 1
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

	ERWIN DELACRUZ		
Designation Page/Line	Objection	Sustained	Overruled
7:4-8:20	"Foundation, FRE 402; 701, 802."	✓	
12:9-20	"Foundation, FRE 402, 701, 802."		✓
16:6-8	"Foundation, FRE 402, 701, 802."		✓
18:10-13	"Foundation, FRE 402, 701, 802."		✓
18:16-19	"Foundation, FRE 402, 701, 802."		✓
18:21-22	"Foundation, FRE 402, 701, 802."		✓
19:16-17	"Foundation, FRE 402, 701, 802."		✓
21:14-23:11	"Foundation, FRE 402, 701, 802."		✓
29:12-14	"Foundation, FRE 402, 701, 802."		✓
29:17-24	"Foundation, FRE 402, 701, 802."		✓
33:2-7	"Foundation, FRE 402, 701, 802."		✓
35:13-15	"Foundation, FRE 402, 701, 802."		✓
35:17-36:10	"Foundation, FRE 402, 701, 802."		✓
41:1-4	"Foundation, FRE 402, 701, 802."		✓
45:17-24	"Foundation, FRE 402, 701, 802."		✓
47:15-17	"Foundation, FRE 402, 701, 802."		✓
47:19-23	"Foundation, FRE 402, 701, 802."		✓
48:3-25	"Foundation, FRE 402, 701, 802."		✓
49:2-8	"Foundation, FRE 402, 701, 802."		✓

	ERWIN DELACRUZ		
Designation Page/Line	Objection	Sustained	Overruled
50:2-5	"Foundation, FRE 402, 701, 802."	✓	
52:9-10	"Foundation, FRE 402, 701, 802."		✓
52:12-14	"Foundation, FRE 402, 701, 802."		✓
52:16-23	"Foundation, FRE 402, 701, 802."		✓
54:1-3	"Foundation, FRE 402, 701, 802."		✓
54:23-25	"Foundation, FRE 402, 701, 802."		✓
55:16-23	"Foundation, FRE 402, 701, 802."		✓
55:25-56:7	"Foundation, FRE 402, 701, 802."		✓
56:9-12	"Foundation, FRE 402, 701, 802."		✓
56:14	"Foundation, FRE 402, 701, 802."		✓
57:23-58:4 11	"Foundation, FRE 402, 701, 802."		✓
58:6	"Foundation, FRE 402, 701, 802."		✓
58:8-11	"Foundation, FRE 402, 701, 802."		✓
59:20-62:10	"Foundation, FRE 402, 701, 802."		✓
64:1-67:18	"Foundation, FRE 402, 701, 802."		✓
69:14-70:5	"Foundation, FRE 402, 701, 802."		✓
70:11-13	"Foundation, FRE 402, 701, 802."		✓
70:15	"Foundation, FRE 402, 701, 802."		✓
70:17	"Foundation, FRE 402, 701, 802."		✓

	ERWIN DELACRUZ		
Designation Page/Line	Objection	Sustained	Overruled
70:21-71:15	"Foundation, FRE 402, 701, 802."		✓
71:17-20	"Foundation, FRE 402, 701, 802."		✓
71:22-72:8	"Foundation, FRE 402, 701, 802."		✓
74:15-83:13	"Foundation, FRE 402, 701, 802."		✓
84:3-5	"Foundation, FRE 402, 701, 802."		✓
84:7-8	"Foundation, FRE 402, 701, 802."		✓
84:21-87:25	"Foundation, FRE 402, 701, 802."		✓
88:2-19	"Foundation, FRE 402, 701, 802."		✓
88:21-89:9	"Foundation, FRE 402, 701, 802."		✓
89:11-14	"Foundation, FRE 402, 701, 802."		✓
89:16	"Foundation, FRE 402, 701, 802."		✓
89:22-25	"Foundation, FRE 402, 701, 802."		✓
91:5-14	"Foundation, FRE 402, 701, 802."		✓
93:5-10	"Foundation, FRE 402, 701, 802."		✓
95:13-96:15	"Foundation, FRE 402, 701, 802."		✓
96:17-97:1	"Foundation, FRE 402, 701, 802."		✓
97:3-6	"Foundation, FRE 402, 701, 802."		✓
97:8-11	"Foundation, FRE 402, 701, 802."		✓
97:13	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 4
(17-cv-05769-RJB)

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ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
101:8-102:2	"Foundation, FRE 402, 701, 802."		✓
102:19-23	"Foundation, FRE 402, 701, 802."		✓
105:14-17	"Foundation, FRE 402, 701, 802."		✓
105:19-106:9	"Foundation, FRE 402, 701, 802."		✓
109:4-6	"Foundation, FRE 402, 701, 802."		✓
109:8-10	"Foundation, FRE 402, 701, 802."		✓
113:2-15	"Foundation, FRE 402, 701, 802."		✓
113:23-24	"Foundation, FRE 402, 701, 802."		✓
114:1	"Foundation, FRE 402, 701, 802."		✓
114:10-23	"Foundation, FRE 402, 701, 802."		✓
114:25-116:5	"Foundation, FRE 402, 701, 802."		✓
119:9-22	"Foundation, FRE 402, 701, 802."		✓
120:5-7	"Foundation, FRE 402, 701, 802."		✓
120:9-14	"Foundation, FRE 402, 701, 802."		✓
120:20-121:6	"Foundation, FRE 402, 701, 802."		✓
122:3-5	"Foundation, FRE 402, 701, 802."		✓
122:17-18	"Foundation, FRE 402, 701, 802."		✓
122:20-124:12	"Foundation, FRE 402, 701, 802."		✓
125:8-10	"Foundation, FRE 402, 701, 802."		

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 5
(17-cv-05769-RJB)

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	ERWIN DELACRUZ		
Designation Page/Line	Objection	Sustained	Overruled
125:12-17	"Foundation, FRE 402, 701, 802."		✓
125:19-23	"Foundation, FRE 402, 701, 802."		✓
125:25-126:4	"Foundation, FRE 402, 701, 802."		✓
126:16-20	"Foundation, FRE 402, 701, 802."		✓
127:8-10	"Foundation, FRE 402, 701, 802."	✓	

	MICHAEL HEYE		
Designation Page/Line	Objection	Sustained	Overruled
6:6-7			✓
7:7-8		✓	
9:7-10:6	"Foundation, FRE 402, 701, 802."	✓	
10:8-13	"Foundation, FRE 402, 701, 802."	✓	
10:18	"Foundation, FRE 402, 701, 802."	✓	
16:24-17:6			✓
18:2-14			✓
20:14-21:4	"Foundation, FRE 402, 701, 802."		✓
21:8-18	"Foundation, FRE 402, 701, 802."		✓
22:2-8	"Foundation, FRE 402, 701, 802."		✓
22:13-24	"Foundation, FRE 402, 701, 802."		✓

MICHAEL HEYE			
Designation Page/Line	Objection	Sustained	Overruled
23:19-24:7	"Foundation, FRE 402, 701, 802."		✓
25:18-26:3	"Foundation, FRE 402, 701, 802."		✓
32:5-8	"Foundation, FRE 402, 701, 802."		✓
32:10-13	"Foundation, FRE 402, 701, 802."		✓
32:15-16	"Foundation, FRE 402, 701, 802."		✓
32:18-19	"Foundation, FRE 402, 701, 802."		✓
42:4-13	"Foundation, FRE 402, 701, 802."		✓
43:10-44:1			✓
44:18-46:1	"Foundation, FRE 402, 701, 802."		✓
49:20-50:16	"Foundation, FRE 402, 701, 802."		✓
51:3-52:9	"Foundation, FRE 402, 701, 802."		✓
52:15-53:4	"Foundation, FRE 402, 701, 802."		✓
53:10-54:11	"Foundation, FRE 402, 701, 802."		✓
54:22-55:8	"Foundation, FRE 402, 701, 802."		✓
55:11-56:18	"Foundation, FRE 402, 701, 802."		✓
57:21-59:23	"Foundation, FRE 402, 701, 802."		✓
60:12-61:24	"Foundation, FRE 402, 701, 802."		✓
62:16-23	"Foundation, FRE 402, 701, 802."		✓
68:23-69:18	"Foundation, FRE 402, 701, 802."		✓

	MICHAEL HEYE		
Designation Page/Line	Objection	Sustained	Overruled
71:14-25	"Foundation, FRE 402, 701, 802."		✓
72:3-4			✓
74:9-20	"Foundation, FRE 402, 701, 802."		✓
81:15-82:14	"Foundation, FRE 402, 701, 802."		✓
87:2-8	"Foundation, FRE 402, 701, 802."		✓
87:11-88:4	"Foundation, FRE 402, 701, 802."		✓
88:11-13	"Foundation, FRE 402, 701, 802."		✓
89:4-8	"Foundation, FRE 402, 701, 802."		✓
90:5-7	"Foundation, FRE 402, 701, 802."		✓
90:9-12	"Foundation, FRE 402, 701, 802."		✓
90:14-16	"Foundation, FRE 402, 701, 802."		✓
90:18-21	"Foundation, FRE 402, 701, 802."		✓
90:23-91:2	"Foundation, FRE 402, 701, 802."		✓
91:4-10	"Foundation, FRE 402, 701, 802."		✓
91:13-14	"Foundation, FRE 402, 701, 802."		✓
91:16-21	"Foundation, FRE 402, 701, 802."		✓
91:23-25	"Foundation, FRE 402, 701, 802."		✓
92:2-11	"Foundation, FRE 402, 701, 802."		✓
94:8-96:24	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 8
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MICHAEL HEYE			
Designation Page/Line	Objection	Sustained	Overruled
97:3-5	"Foundation, FRE 402, 701, 802."		✓
97:13-98:9	"Foundation, FRE 402, 701, 802."		✓
106:20-22	"Foundation, FRE 402, 701, 802."	✓	
106:24-107:5	"Foundation, FRE 402, 701, 802."	106:24- 25	✓
107:7-22	"Foundation, FRE 402, 701, 802."		✓
107:24	"Foundation, FRE 402, 701, 802."		✓
108:10-14	"Foundation, FRE 402, 701, 802."		✓
114:14-15	"Foundation, FRE 402, 701, 802."		✓
115:7-10	"Foundation, FRE 402, 701, 802."		✓
115:24-116:7	"Foundation, FRE 402, 701, 802."		✓

MARC A. JOHNSON			
Designation Page/Line	Objection	Sustained	Overruled
5:9-10			✓
5:21-25			✓
7:16-8:23	"Foundation, FRE 402, 701, 802."	✓	
9:1		✓	
11:16-17	"Foundation, FRE 402, 701, 802."		✓
12:3-21	"Foundation, FRE 402, 701, 802."		✓

	MARC A. JOHNSON		
Designation Page/Line	Objection	Sustained	Overruled
20:9-12	"Foundation, FRE 402, 701, 802."		✓
20:14-20	"Foundation, FRE 402, 701, 802."		✓
25:20-26:5	"Foundation, FRE 402, 701, 802."		✓
26:16-23	"Foundation, FRE 402, 701, 802."		✓
26:25-27:1	"Foundation, FRE 402, 701, 802."		✓
27:3-10	"Foundation, FRE 402, 701, 802."		✓
27:16-28:23	"Foundation, FRE 402, 701, 802."		✓
29:14-30:23	"Foundation, FRE 402, 701, 802."		✓
32:9-33:10	"Foundation, FRE 402, 701, 802."		✓
33:12-34:6	"Foundation, FRE 402, 701, 802."		✓
46:6-23	"Foundation, FRE 402, 701, 802."		✓
46:25	"Foundation, FRE 402, 701, 802."		✓
47:8-13	"Foundation, FRE 402, 701, 802."		✓
47:15	"Foundation, FRE 402, 701, 802."		✓
48:23-2	"Foundation, FRE 402, 701, 802."		✓
49:2	"Foundation, FRE 402, 701, 802."		✓
49:12-14	"Foundation, FRE 402, 701, 802."		✓
50:2-6	"Foundation, FRE 402, 701, 802."		✓
50:8-10	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 10
(17-cv-05769-RJB)

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	MARC A. JOHNSON		
Designation Page/Line	Objection	Sustained	Overruled
50:12	"Foundation, FRE 402, 701, 802."		✓
51:3-10	"Foundation, FRE 402, 701, 802."		✓
51:12-18	"Foundation, FRE 402, 701, 802."		✓
51:22-25	"Foundation, FRE 402, 701, 802."		✓
52:16-25	"Foundation, FRE 402, 701, 802."		✓
53:20-54:3	"Foundation, FRE 402, 701, 802."		✓
54:10-11	"Foundation, FRE 402, 701, 802."		✓
54:14-18	"Foundation, FRE 402, 701, 802."		✓
54:24-55:12	"Foundation, FRE 402, 701, 802."		✓
55:14	"Foundation, FRE 402, 701, 802."		✓
55:19-57:3	"Foundation, FRE 402, 701, 802."		✓
57:12-58:3	"Foundation, FRE 402, 701, 802."		✓
58:6-9	"Foundation, FRE 402, 701, 802."		✓
58:21-59:11	"Foundation, FRE 402, 701, 802."		✓
59:18-60:11	"Foundation, FRE 402, 701, 802."		✓
60:14-18	"Foundation, FRE 402, 701, 802."		✓
60:23-61:2	"Foundation, FRE 402, 701, 802."		✓
62:7-8	"Foundation, FRE 402, 701, 802."		✓
62:20-24	"Foundation, FRE 402, 701, 802."		✓

	MARC A. JOHNSON		
Designation Page/Line	Objection	Sustained	Overruled
63:1-20	"Foundation, FRE 402, 701, 802."		✓
64:3-17	"Foundation, FRE 402, 701, 802."		✓
65:22-66:2	"Foundation, FRE 402, 701, 802."		✓
68:6-12	"Foundation, FRE 402, 701, 802."		✓
68:18-21	"Foundation, FRE 402, 701, 802."		✓
69:16-70:8	"Foundation, FRE 402, 701, 802."		✓
71:20-24	"Foundation, FRE 402, 701, 802."		✓
72:12-18	"Foundation, FRE 402, 701, 802."		✓
73:24-74:7	"Foundation, FRE 402, 701, 802."		✓

	BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE		
Designation Page/Line	Objection	Sustained	Overruled
6:9-12			✓
6:22-25			✓
7:5-8:4	"Foundation, FRE 402, 701, 802."	✓	
8:6-11	"Foundation, FRE 402, 701, 802."	✓	
8:13-23	"Foundation, FRE 402, 701, 802."		✓
8:25	"Foundation, FRE 402, 701, 802."		✓
9:2-3	"Foundation, FRE 402, 701, 802."		✓

	BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE		
Designation Page/Line	Objection	Sustained	Overruled
9:5	"Foundation, FRE 402, 701, 802."		✓
13:6-8	"Foundation, FRE 402, 701, 802."		✓
13:16-18	"Foundation, FRE 402, 701, 802."		✓
14:22-15:2	"Foundation, FRE 402, 701, 802."		✓
16:2-3	"Foundation, FRE 402, 701, 802."		✓
16:5-7	"Foundation, FRE 402, 701, 802."		✓
17:5-15	"Foundation, FRE 402, 701, 802."		✓
17:22-18:4	"Foundation, FRE 402, 701, 802."		✓
18:14-19	"Foundation, FRE 402, 701, 802."		✓
18:21-24	"Foundation, FRE 402, 701, 802."		✓
19:1-3	"Foundation, FRE 402, 701, 802."		✓
19:5-7	"Foundation, FRE 402, 701, 802."		✓
23:22-24	"Foundation, FRE 402, 701, 802."		✓
24:1	"Foundation, FRE 402, 701, 802."		✓
24:24-25:3	"Foundation, FRE 402, 701, 802."		✓
28:9-18	"Foundation, FRE 402, 701, 802."		✓
28:20-29:6	"Foundation, FRE 402, 701, 802."		✓
29:8-14	"Foundation, FRE 402, 701, 802."		✓
30:17-31:2	"Foundation, FRE 402, 701, 802."		✓

	BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE		
Designation Page/Line	Objection	Sustained	Overruled
36:8-13	"Foundation, FRE 402, 701, 802."		✓
36:15-18	"Foundation, FRE 402, 701, 802."		✓
36:20-37:2	"Foundation, FRE 402, 701, 802."		✓
61:23-62:24	"Foundation, FRE 402, 701, 802."		✓
64:11-21	"Foundation, FRE 402, 701, 802."		✓
66:20-23	"Foundation, FRE 402, 701, 802."		✓
66:25-67:2	"Foundation, FRE 402, 701, 802."		✓
67:4-9	"Foundation, FRE 402, 701, 802."		✓
69:22-24	"Foundation, FRE 402, 701, 802."		✓
70:18-21	"Foundation, FRE 402, 701, 802."		✓
70:25-71:1	"Foundation, FRE 402, 701, 802."		✓
71:3	"Foundation, FRE 402, 701, 802."		✓
71:16-17	"Foundation, FRE 402, 701, 802."		✓
71:21-22	"Foundation, FRE 402, 701, 802."		✓
71:24	"Foundation, FRE 402, 701, 802."		✓
72:1-2	"Foundation, FRE 402, 701, 802."		✓
72:4	"Foundation, FRE 402, 701, 802."		✓
74:6-18	"Foundation, FRE 402, 701, 802."		✓
75:14-20	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 14
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BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE			
Designation Page/Line	Objection	Sustained	Overruled
79:6-11	"Foundation, FRE 402, 701, 802."		✓
85:3-20	"Foundation, FRE 402, 701, 802."		✓
85:22	"Foundation, FRE 402, 701, 802."		✓
85:24-86:4	"Foundation, FRE 402, 701, 802."		✓
86:19-87:1	"Foundation, FRE 402, 701, 802."		✓
87:4-88:12	"Foundation, FRE 402, 701, 802."		✓
88:14-20	"Foundation, FRE 402, 701, 802."		✓
89:5-23	"Foundation, FRE 402, 701, 802."		✓
89:25-90:11	"Foundation, FRE 402, 701, 802."		✓
90:13-25	"Foundation, FRE 402, 701, 802."		✓
91:8-20	"Foundation, FRE 402, 701, 802."		✓
92:3-4	"Foundation, FRE 402, 701, 802."		✓
92:6-23	"Foundation, FRE 402, 701, 802."		✓
94:21-22	"Foundation, FRE 402, 701, 802."		✓
94:24-25	"Foundation, FRE 402, 701, 802."		✓
98:15-18	"Foundation, FRE 402, 701, 802."		✓
102:22-25	"Foundation, FRE 402, 701, 802."		✓
112:13-20	"Foundation, FRE 402, 701, 802."		✓

	BRUCE SCOTT, INDIVIDUALLY		
Designation Page/Line	Objection	Sustained	Overruled
6:2-3			✓
6:10-13			✓
6:23-7:2			✓
8:5-12	"Foundation, FRE 402, 701, 802."	✓	
8:14-9:13	"Foundation, FRE 402, 701, 802."	✓	
8:15-16	"Foundation, FRE 402, 701, 802."	✓	
15:23-16:13	"Foundation, FRE 402, 701, 802."		✓
19:1-9	"Foundation, FRE 402, 701, 802."		✓
22:2-23:2	"Foundation, FRE 402, 701, 802."		✓
24:18-25:16	"Foundation, FRE 402, 701, 802."		✓
26:6-7	"Foundation, FRE 402, 701, 802."		✓
26:9-10	"Foundation, FRE 402, 701, 802."		✓
26:12-16	"Foundation, FRE 402, 701, 802."		✓
30:17-25	"Foundation, FRE 402, 701, 802."		✓
31:2-3	"Foundation, FRE 402, 701, 802."		✓
61:11-62:21	"Foundation, FRE 402, 701, 802."		✓
65:13-15	"Foundation, FRE 402, 701, 802."		✓
65:17-2	"Foundation, FRE 402, 701, 802."		✓
66:5-6	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 16
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BRUCE SCOTT, INDIVIDUALLY			
Designation Page/Line	Objection	Sustained	Overruled
73:16-21	"Foundation, FRE 402, 701, 802."		✓
73:23-74:1	"Foundation, FRE 402, 701, 802."		✓
74:3-4	"Foundation, FRE 402, 701, 802."		✓

DAVID TRACY			
Designation Page/Line	Objection	Sustained	Overruled
10:2-3			✓
10:10-13			✓
10:19-22			✓
12:11-21	"Foundation, FRE 402, 701, 802."	✓	
12:25-13:13	"Foundation, FRE 402, 701, 802."	✓	
13:16-22	"Foundation, FRE 402, 701, 802."	✓	
14:2-3	"Foundation, FRE 402, 701, 802."	✓	
14:5	"Foundation, FRE 402, 701, 802."	✓	
17:4-5	"Foundation, FRE 402, 701, 802."		✓
17:21-18:9	"Foundation, FRE 402, 701, 802."		✓
18:23-19:6	"Foundation, FRE 402, 701, 802."		✓
21:5-22:14	"Foundation, FRE 402, 701, 802."		✓
21:16-19	"Foundation, FRE 402, 701, 802."		✓

	DAVID TRACY		
Designation Page/Line	Objection	Sustained	Overruled
23:2-8	"Foundation, FRE 402, 701, 802."		✓
23:10-13	"Foundation, FRE 402, 701, 802."		✓
23:15-24	"Foundation, FRE 402, 701, 802."		✓
26:13-20	"Foundation, FRE 402, 701, 802."		✓
27:2-6	"Foundation, FRE 402, 701, 802."		✓
27:9-15	"Foundation, FRE 402, 701, 802."		✓
27:17	"Foundation, FRE 402, 701, 802."		✓
28:4-29:7	"Foundation, FRE 402, 701, 802."		✓
29:22-30:4	"Foundation, FRE 402, 701, 802."		✓
30:6	"Foundation, FRE 402, 701, 802."		✓
30:14-31:25	"Foundation, FRE 402, 701, 802."		✓
33:8-34:19	"Foundation, FRE 402, 701, 802."		✓
35:8-18	"Foundation, FRE 402, 701, 802."		✓
35:20-36:9	"Foundation, FRE 402, 701, 802."		✓
36:11	"Foundation, FRE 402, 701, 802."		✓
36:13-14	"Foundation, FRE 402, 701, 802."		✓
36:16-25	"Foundation, FRE 402, 701, 802."		✓
37:2-18	"Foundation, FRE 402, 701, 802."		✓
38:2-10	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 18
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	DAVID TRACY		
Designation Page/Line	Objection	Sustained	Overruled
39:3-40:8	"Foundation, FRE 402, 701, 802."		✓
40:16-41:19	"Foundation, FRE 402, 701, 802."		✓
41:25-42:2	"Foundation, FRE 402, 701, 802."		✓
42:4-14	"Foundation, FRE 402, 701, 802."		✓
42:21-43:11	"Foundation, FRE 402, 701, 802."	43:9-11	✓
44:5-46:3	"Foundation, FRE 402, 701, 802."		✓
46:5-6	"Foundation, FRE 402, 701, 802."		✓
46:11-18	"Foundation, FRE 402, 701, 802."		✓
49:6-25	"Foundation, FRE 402, 701, 802."		✓
51:2-21	"Foundation, FRE 402, 701, 802."		✓
51:23	"Foundation, FRE 402, 701, 802."		✓
52:10-16	"Foundation, FRE 402, 701, 802."		✓
52:18	"Foundation, FRE 402, 701, 802."		✓
53:5-20	"Foundation, FRE 402, 701, 802."		✓
54:7-12	"Foundation, FRE 402, 701, 802."		✓
56:1-3	"Foundation, FRE 402, 701, 802."		✓
56:5-12	"Foundation, FRE 402, 701, 802."		✓
59:1-2	"Foundation, FRE 402, 701, 802."		✓
59:4-10	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 19
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
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	DAVID TRACY		
Designation Page/Line	Objection	Sustained	Overruled
59:13-22	"Foundation, FRE 402, 701, 802."		✓
60:4-15	"Foundation, FRE 402, 701, 802."		✓
60:21-61:1	"Foundation, FRE 402, 701, 802."		✓
64:24-65:15	"Foundation, FRE 402, 701, 802."		✓
66:3-19	"Foundation, FRE 402, 701, 802."		✓
67:8-12	"Foundation, FRE 402, 701, 802."		✓
70:3-20	"Foundation, FRE 402, 701, 802."		✓
71:5-9	"Foundation, FRE 402, 701, 802."	71:8+9	✓
73:8-74:14	"Foundation, FRE 402, 701, 802."		✓
74:16-19	"Foundation, FRE 402, 701, 802."		✓
75:21-22	"Foundation, FRE 402, 701, 802."		✓
75:24	"Foundation, FRE 402, 701, 802."		✓
76:7-22	"Foundation, FRE 402, 701, 802."		✓
80:22-24	"Foundation, FRE 402, 701, 802."		✓
81:3-17	"Foundation, FRE 402, 701, 802."		✓
81:19-22	"Foundation, FRE 402, 701, 802."		✓
81:24-25	"Foundation, FRE 402, 701, 802."		✓
82:2-3	"Foundation, FRE 402, 701, 802."		✓
82:14-18	"Foundation, FRE 402, 701, 802."		✓

DAVID TRACY			
Designation Page/Line	Objection	Sustained	Overruled
83:21	"Foundation, FRE 402, 701, 802."		✓
83:23	"Foundation, FRE 402, 701, 802."		✓
84:13-20	"Foundation, FRE 402, 701, 802."		✓
86:6-8	"Foundation, FRE 402, 701, 802."		✓
86:17-87:5	"Foundation, FRE 402, 701, 802."		✓
88:3-25	"Foundation, FRE 402, 701, 802."		✓
89:2	"Foundation, FRE 402, 701, 802."		✓
93:3-9	"Foundation, FRE 402, 701, 802."		✓

DATED at Seattle, Washington this 15th day of May, 2020.

SCHROETER GOLDMARK & BENDER

s/ Jamal N. Whitehead

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